respectfully traverse these rejections based on the following points.

Claim 1 recites a system for establishing a communications pipe between a personal security device (PSD) and a remote computer system over a network that uses a local client as a host for the PSD. The Office Action proposes that DiGiorgio similarly discloses, in Fig. 1, a secure token device 10 that communicates with a remote system 14 through a reader 12 and that DiGiorgio's reader 12 corresponds to the claimed feature of a local client (see Office Action section 2, lines 4-5, and section 4, lines 2-8). More specifically, the Office Action proposes that DiGiorgio's reader 12 meets the limitation of a client communication unit for transmitting and receiving message packets over a network, using a packet-based communication protocol, and communicating APDUs over a link to a PSD (section 4, lines 2-8).

However, claim 1 recites that the local client has a client communications section that communicates message packets over the network using a packet-based communication protocol and communicates APDUs over a PSD interface. And DiGiorgio fails to disclose a network interconnecting reader 12 with remote system 14. The Office Action proposes that DiGiorgio's remote system 14 is the device that encapsulates APDUs, received from secure token device 10 via reader 12, into message packets (see section 2,

lines 5-13). Specifically, the Office Action acknowledges that DiGiorgio discloses that secure token device 10 communicates with remote system 14 through reader 12 (section 2, lines 4-5) and this communication occurs by passing data packages, which are known as APDUs (section 2, line 7), back and forth through reader 12 (section 2, lines 5-6). Additionally, the Office Action proposes that remote system 14 encapsulates incoming APDUs received from the PSD into message packets (section 2, lines 12-13).

Accordingly, the very proposals and acknowledgments of the Office Action constitutes a recognition that DiGiorgio does not disclose a reader 12, which the Office Action likens to the claimed local client, having a communications section that communicates message packets over a network using a packet-based communication protocol. Instead, DiGiorgio discloses that reader 12 communicates with both secure token device 10 and remote system 14 via non-networked links and using APDUs.

Moreover, claim 1 recites that the local client: (1) de-encapsulates APDUs from message packets received from a remote computer system over a network and communicates the APDUs to a PSD and (2) encapsulates APDUs received from the PSD into message packets and communicates the message packets to the remote computer. The Office Action recognizes that DiGiorgio fails to

disclose these features. The Office Action acknowledges that DiGiorgio merely discloses that secure token device 10 communicates with remote system 14 through reader 12 (section 2, lines 4-5). Continuing, the Office Action acknowledges that this communication occurs by passing data packages back and forth through reader 12 (section 2, lines 5-6) and that these packages are known as APDUs (section 2, line 7).

Given that the Office Action expressly acknowledges that APDUs are passing back and forth through reader 12, it follows *per force* that reader 12, which the Office Action likens to the claimed local client, cannot be encapsulating received APDUs into transmitted message packets and de-encapsulating APDUs received in message packets for transmission in the form of APDUs. Instead, the data received by reader 12 is in the form of APDUs and the data transmitted by reader 12 is in the form of APDUs, regardless of the direction the APDUs are communicated through reader 12.

As is evident from examination of DiGiorgio's Figs. 8A and 8B and their accompanying descriptions in the specification, the APDUs passing through reader 12 have no address information for identifying the intended source or destination devices of the communicated APDU. This is because reader 12 interfaces a single secure token device 10, at any time, to a single remote system 14

and each communicated APDU has only one possible destination, which also identifies the source by a process of elimination (i.e., if secure token receives the APDU, then remote system 14 must have sent it; and if remote system 14 received the APDU, then secure token device 10 must have sent it). Reader 12 does not have a network interface to either secure token device 10 or remote system 14; therefore, having reader 12 convert: (1) received APDUs into message packets with network addressing information and (2) received message packets into APDUs would be superfluous.

In accordance with the above discussion, it follows that DiGiorgio's reader 12 is not a local client that: (1) de-encapsulates APDUs from message packets received from a remote computer system over a network and communicates the APDUs to a PSD and (2) encapsulates APDUs received from the PSD into message packets and communicates the message packets to the remote computer.

Furthermore, the Applicants submit that the claimed term "client" has a well-understood meaning to those of ordinary skill in the art, and Applicants' use of this term in the specification is in accord with its common meaning. A reader 12 that reads information from a smart card, as proposed in the Office Action, is not a client, as this term is understood by skilled artisans,

any more than a floppy disk drive, which reads floppy disks, is a client.

Due to the unlikelihood that the claimed local client might be characterized as corresponding to DiGiorgio's reader 12, rather than DiGiorgio's disclosed client device (i.e., remote system 14), and ambiguities in the remarks presented to support the anticipation rejections, the Applicants previous rebuttals to the rejections seemingly were mis-directed toward distinguishing the claimed local client's features from those disclosed for DiGiorgio's remote system 14. To the extent the Office may find it appropriate to re-characterize the claimed local client as corresponding to DiGiorgio's remote system 14, the Applicants hereby incorporate the remarks presented in the Response dated December 5, 2005, for traversing this characterization.

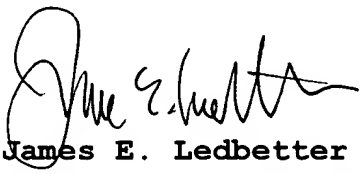
In accordance with the discussion provided above, the Applicants respectfully submit that DiGiorgio does not anticipate the subject matter defined by claim 1. Independent claims 20, 29, and 42 similarly recite the above-described features distinguishing apparatus claim 1 from DiGiorgio, but with respect to methods. Therefore, allowance of claims 1, 20, 29, and 42 and all claims dependent therefrom is warranted.

Applicants will address the double patenting rejection when its provisional status is removed.

In view of the above, it is submitted that this application is in condition for allowance and a notice to that effect is respectfully solicited.

If any issues remain which may best be resolved through a telephone communication, the Examiner is requested to telephone the undersigned at the local Washington, D.C. telephone number listed below.

Respectfully submitted,



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